

1 PATRICK D. ROBBINS (CABN 152288)
2 Acting United States Attorney
3 PAMELA T. JOHANN (CABN 145558)
4 Chief, Civil Division
5 KELSEY J. HELLAND (CABN 298888)
6 Assistant United States Attorney
7 U.S. ATTORNEY'S OFFICE
8 450 Golden Gate Avenue, Box 36055
9 San Francisco, California 94102-3495
10 ERIC HAMILTON
11 Deputy Assistant Attorney General
12 DIANE KELEHER
13 Branch Director
14 CHRISTOPHER HALL
15 Assistant Branch Director
16 JAMES D. TODD, JR.
17 Senior Trial Counsel
18 U.S. DEPARTMENT OF JUSTICE
19 Civil Division, Federal Programs Branch
20 P.O. Box 883
21 Washington, DC 20044

22 *Counsel for Defendants*

23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

16
17 AMERICAN FEDERATION OF
18 GOVERNMENT EMPLOYEES, *et al.*

19 Plaintiffs,

20 v.

21 UNITED STATES OFFICE OF PERSONNEL
22 MANAGEMENT, *et al.*,

23 Defendants.

24 Case No. 3:25-cv-1780-WHA

25
26
27
28

**DECLARATION OF CRYSTAL TAYLOR
IN SUPPORT OF DEFENDANT
DEPARTMENT OF COMMERCE'S
REPORT REGARDING COMPLIANCE
WITH SEPTEMBER 12, 2025 ORDER**

1 Pursuant to 28 U.S.C. § 1746, I, Crystal Taylor, declare as follows:

2 1. I am the Acting Chief Human Capital Officer and Director, Office of Human
3 Resources Management at the Department of Commerce (Commerce), headquartered in
4 Washington, D.C. I have served in this position since September 25, 2025. I make this
5 Declaration based on my own personal knowledge, on information contained in the records of
6 the Department of Commerce, or on information provided to me by Commerce employees.

7 2. In my role at Commerce, I am responsible for personnel management. I have the
8 responsibility for overseeing the personnel enterprise and tracking and recording of personnel
9 actions, including terminations. I assist in ensuring that all personnel actions comply with court
10 orders and federal law, including those related to probationary employees.

11 3. I acknowledge having received and read this Court's September 12, 2025 Order
12 on Cross-Motions for Summary Judgment.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
14 and correct.

15 Dated: October 27, 2025

16
17
18 /s/
19
20 CRYSTAL TAYLOR
21 ACTING CHIEF HUMAN CAPITAL OFFICER
22 DIRECTOR, OFFICE OF HUMAN RESOURCES
23 MANAGEMENT
24 U.S. DEPARTMENT OF COMMERCE
25
26
27
28